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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass,

Plaintiffs,

vs.

ALAMEDA COUNTY SHERIFFS OFFICE,
et al.

Defendants.

Case No. 3:19-cv-07423-JSC

**STIPULATION FOR LIMITED
EXTENSION OF FACT DISCOVERY
DEADLINE**

TO THE HONORABLE COURT AND ALL PARTIES AND COUNSEL:

Plaintiffs and the Alameda County Defendants (collectively, “the parties”) jointly submit this stipulation to extend fact discovery.

WHEREAS, the current fact discovery deadline is set for October 16, 2023;

WHEREAS, the Court recently amended its Pretrial Scheduling Order to extend all other case management deadlines;

WHEREAS, the next case management deadline, following the issuance of the Court’s Amended Pretrial Scheduling Order, is the expert disclosure deadline, currently set for January 12,

1 2024;

2 WHEREAS, Plaintiffs are currently meeting and conferring with all Defendants about their
3 discovery requests, are awaiting Defendants' document productions, and are evaluating whether to
4 request supplemental responses;

5 WHEREAS, the parties' agreement to take the deposition of Plaintiff Randy Harris on a
6 previously agreed-upon date was thwarted by a defense counsel's unexpected illness and Plaintiffs'
7 counsel's subsequent unavailability;

8 WHEREAS, the parties are preparing an informal written discovery brief asking the Court
9 to compel Plaintiff Michael Lockhart to appear for deposition or have his claims dismissed;

10 WHEREAS, Plaintiffs are currently meeting and conferring with Defendants to schedule a
11 number of defense depositions;

12 WHEREAS, the parties agree that no additional written discovery requests are permitted;

13 WHEREAS, Defendants Wellpath and Aramark Correctional Services LLC and
14 WELLPATH MANAGEMENT, INC. do not agree to this proposed limited fact discovery extension
15 and have indicated that they intend to oppose it;

16 NOW, THEREFORE, Plaintiffs and the Alameda County Defendants hereby respectfully
17 request that the Court grant a limited, 30-day extension of the fact discovery deadline, from October
18 16, 2023 to November 16, 2023, solely to permit the parties to:

19 1. Schedule, conduct and complete all depositions properly noticed in compliance with
20 all applicable rules and the Court's standing orders;

21 2. Permit the parties to complete all currently, existing written discovery, to complete
22 any necessary met and conferring, and to seek the Court's assistance resolving any remaining issues,
23 if any;

24 3. Permit the Court to resolve the issues surrounding the parties' forthcoming informal
25 written discovery brief to compel Plaintiff Michael Lockhart to appear for deposition or to have his
26 claims dismissed.

27 Respectfully submitted.

1 DATED: September 21, 2023

LAW OFFICES OF YOLANDA HUANG

2
3 By: /s/ Yolanda Huang
4 Yolanda Huang
5 Attorney for Plaintiffs

6 DATED: September 21, 2023

LAW OFFICE OF THOMAS E. NANNEY

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9 By: /s/ Thomas E. Nanney
10 Thomas E. Nanney
11 Attorney for Plaintiffs

12 DATED: September 21, 2023

BURKE WILLIAMS & SORENSEN LLP

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15 By: /s/ Temitayo O. Peters
16 Temitayo O. Peters
17 Attorneys for Defendants, County of Alameda,
18 Alameda County Sheriff's Office, Deputy Joe, and
19 Deputy Ignont
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22 **ATTESTATION PER LOCAL RULE 5-1(h)(3)**

23 I, Yolanda Huang, attest that concurrence in the filing of this document has been obtained
24 from the other signatories.
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1 DATED: September 21 2023

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3 /s/ Yolanda Huang

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6 [Proposed] ORDER

7 The stipulation of 2 the parties having been submitted, and good cause appearing,
8 IT IS HEREBY ORDERED that fact discovery is extended from October 16, 2023 to
9 November 16, 2023 for the limited purpose of permitting the parties to:

10 1. Schedule, conduct and complete all depositions properly noticed in compliance with
11 all applicable rules and the Court's standing orders;

12 2. Permit the parties to complete all currently, existing written discovery, to complete
13 any necessary met and conferring, and to seek the Court's assistance resolving any remaining issues,
14 if any;

15 3. Permit the Court to resolve the issues surrounding the parties' forthcoming
16 informal written discovery brief to compel Plaintiff Michael Lockhart to appear for deposition or
17 to have his claims dismissed.

18 No party shall be allowed to serve, nor required to respond to, any written discovery
19 requests not timely served in compliance with the prior October 16, 2023 fact discovery cutoff
20 date.

21 Dated: _____, 2023

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23 JUDGE OF THE FEDERAL DISTRICT COURT